



Garson, Segal, Steinmetz, Fladgate LLP

Robert Garson ◊
Michael Steinmetz * ∞ □
Chris Fladgate °
Thomas Segal ^

Stephen Greenwald
John Lane ∞
Timothy Kendal ◊
Ilan Ben Avraham ▽

Kevin Kehrli <
Maddie Brown

Tel: +1 (212) 380-3623
Fax: +1 (347) 537-4540

Additional Bar
Memberships
◊ England and Wales
^ Paris
* New Jersey
< Pennsylvania

∞ Patent Bar
° Victoria (Australia)
▽ Israel
□ Colorado

Email: kk@gs2law.com

Via ECF

August 31, 2021

Hon. Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Norris v. Goldner et. al (19-cv-5491(AJN(SN))

To the Hon. Sarah Netburn:

This firm represents Defendants in the above-referenced action. I write in response to Plaintiff's August 25, 2021 Letter regarding discovery, scheduling, and a requested conference.

As an initial matter, to clarify the record, Plaintiff's position regarding the Small Business Administration loan agreements is disputed, and Defendants' position is that none of the intellectual property subject to the agreement in dispute in this case was conveyed or collateralized. As such, Plaintiff's position that Defendants misrepresented in the applications is both misplaced and improper, as only the SBA would have the authority or standing to make such arguments.

Second, over the last two weeks, the undersigned and the Partner at the firm have been working to resolve certain issues between our firm and our clients, which have not been resolved. Accordingly, it is counsel's intention to move this Court for leave to withdraw as counsel, and would respectfully request that the due to the upcoming holidays, Court allow counsel until September 10th to do so.

Respectfully Submitted,

/s/ Kevin Kehrli
Kevin Kehrli, Esq.

USA: 164 WEST 25TH STREET, 11TH FLOOR, NEW YORK, NY 10001
UK: 2 BEDFORD ROW, LONDON WC1R 4BU
WWW.GS2LAW.COM